

1 Jason C. Murray (CA Bar No. 169806)
2 CROWELL & MORING LLP
3 515 South Flower St., 40th Floor
4 Los Angeles, CA 90071
5 Telephone: 213-622-4750
6 Facsimile: 213-622-2690
7 Email: jmmurray@crowell.com

8 Counsel for Plaintiffs
9 *Target Corp.; Sears, Roebuck and Co.;*
10 *Kmart Corp.; Old Comp Inc.; Good*
11 *Guys, Inc.; RadioShack Corp*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To:

Target Corp., et al. v. Hitachi, Ltd., et al.,
Case No. 3:11-CV 11-05515-MEJ

CASE No. CV 07-5944-SC

MDL No. 1917

**DECLARATION OF JASON C.
MURRAY IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CASE SHOULD BE RELATED**

1 I, Jason C. Murray, hereby declare as follows:

2 1. I am a partner at Crowell & Moring LLP, counsel of record for plaintiffs Target
3 Corp.; Sears, Roebuck and Co.; Kmart Corp.; Old Comp Inc.; Good Guys, Inc.; and RadioShack
4 Corp. and am duly licensed to practice before this Court. I am making this declaration in support
5 of Plaintiffs' Administrative Motion to Consider Whether Case Should Be Related. I have
6 personal knowledge of the facts stated herein and, if called as a witness, could and would testify
7 competently as to the matters set forth herein.

8 2. Attached hereto as Exhibit A is a copy of the Complaint filed in *Target Corp., et al*
9 *v. Hitachi Ltd., et al.*, Case No. 4:11-cv-05515-YGR (the "Target Action").

10 3. The Target Action is an antitrust action filed against certain defendants also named
11 in *In re Cathode Ray Tube (CRT) Antitrust Litigation*, Case No. CV-07-5944-SC (MDL No.
12 1917). Both actions involve allegations that defendants conspired to fix the prices of Cathode
13 Ray Tubes ("CRTs") and seek the same form of relief under Section 1 of the Sherman Act,
14 Sections 4 and 16 of the Clayton Act, and the laws of California and other states.

15 4. A stipulation pursuant to Civil Local Rule 7-11(a) could not be obtained because
16 defendants in the Target Action have not yet appeared.

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct. Executed this 8th day of March, 2012.

19
20 /s/ Jason C. Murray

Jason C. Murray